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May 2, 2024

**VIA CM/ECF**

Honorable Ona T. Wang  
United States Magistrate Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**Re: Frank Liu vs. The Nielsen Company (US), LLC, et al.; Case No.: 1:22-cv-09084-JHR-OTW**

Dear Judge Wang:

On behalf of defendants The Nielsen Company (US), LLC and TNC US Holdings (collectively, “Defendants”), we write in response to this Court’s Order, dated April 30, 2024 (the “Order”). (ECF No. 84.) The Order grants Plaintiff Frank Liu’s (“Plaintiff”) request to amend his response in opposition to Defendants’ motion to dismiss and directs Plaintiff to file his sur-reply by May 24, 2024. The Order further provides that Plaintiff may address any of the arguments raised in Defendants’ motion to dismiss at ECF Nos. 53 and 54, in addition to any arguments raised in Defendants’ reply in support at ECF 77.

In light of the above, Defendants request leave of the Court to file a response to Plaintiff’s anticipated sur-reply, on or before June 17, 2024. Thank you for your consideration of the foregoing.

Dated: Chicago, Illinois

Respectfully submitted,

May 2, 2024

A handwritten signature in blue ink that reads "Cardelle B. Spangler".

Cardelle Spangler (*admitted pro hac vice*)

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cc: Plaintiff Frank Liu